

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

CONNELL GRIFFIN,)
)
Plaintiff,)
)
vs.) No.
)
SUPERVALU HOLDINGS, INC.,)
d/b/a CUB FOODS, INC.,)
)
Defendant.)

FILED
JANUARY 30, 2008
MICHAEL W. DOBBINS
CLERK, U.S. DISTRICT COURT

PH 08 C 657

JUDGE GETTLEMAN
MAGISTRATE JUDGE BROWN

COMPLAINT

NOW COMES the Plaintiff, CONNELL GRIFFIN, by and through his attorneys,
WAYNE B. GIAMPIETRO and THEODORE J. BEDNAREK, and for his Complaint against the
Defendant, SUPERVALU HOLDINGS, INC., d/b/a CUB FOODS, INC., states as follows:

1. That the Plaintiff, Connell Griffin, currently resides at 101 Princeton, Lockport, Will County, Illinois.
2. That the Defendant, SUPERVALU HOLDINGS, INC., d/b/a CUB FOODS, INC., is an Ohio Corporation, with its principal place of business in Minnesota. At the time of the incident alleged herein, Defendant Cub Foods maintained a grocery store at 1590 North Larkin Avenue, Joliet, Will County, Illinois.
3. There is complete diversity of citizenship between the parties, the amount in dispute in this cause is in excess of Seventy-Five Thousand Dollars, exclusive of interest and costs and this Court has jurisdiction over this cause pursuant to 28 U.S.C. 1332(a)(1).
4. That on January 18, 2005, the Plaintiff, CONNELL GRIFFIN, was lawfully on the premises at 1590 N. Larkin Avenue, Joliet, Will County, Illinois.

5. That on January 18, 2005, while CONNELL GRIFFIN was proceeding through the produce department at the grocery store, at which time he slipped and fell on several grapes on the floor.
6. That it was the duty of the Defendant, SUPERVALU HOLDINGS, INC., d/b/a CUB FOODS, acting through its agents and employees to maintain their premises in a reasonably safe condition for people like CONNELL GRIFFIN, who were lawfully on the premises.
7. That in violation of the above mentioned duty, the Defendant, SUPERVALU HOLDINGS, INC., d/b/a CUB FOODS, INC., acting through its agents and employees, were negligent in the following ways:
 - a. Failed to clean the premises in a way which would avoid causing harm to CONNELL GRIFFIN, while he was legally on the premises.
8. That as a result of the above-mentioned negligence, the Plaintiff, CONNELL GRIFFIN, suffered permanent injury to his neck and back. He experienced and will continue to experience pain and suffering. He incurred and will continue to incur medical bills. He was also unable to attend to his usual duties and thereby lost wages and income.

WHEREFORE, Plaintiff, CONNELL GRIFFIN, prays for a judgment against the Defendant, SUPERVALU HOLDINGS, INC., D/B/A CUB FOODS, INC., in a sum in excess of One Hundred Thousand Dollars (\$100,000.00) plus his costs of suit.

CONNELL GRIFFIN, Plaintiff

S/ Wayne B. Giampietro
Attorney for Plaintiff

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